

578-0332/4868-4067-7157

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
PIERRE E. LOUISSANT,

Plaintiff,

**NOTICE OF REMOVAL**

—against—

ANSELMO MARQUEZ and MCCOLLISTER'S  
TRANSPORTATION GROUP, INC., aka  
ADVANCE TECHNOLG TRANSPORTING, LLC,

Defendants.

-----X

Defendants Anselmo Marquez, McCollister's Transportation Group, Inc., and Advanced Technology Transportation, LLC, sued herein as Advance Technlg Transporting, LLC (Defendants) state as follows for their notice of removal:

The Action

1. On or about May 9, 2022, plaintiff Pierre E. Louissaint filed a complaint in a civil action for money damages for personal injuries arising from a motor vehicle accident in the Supreme Court of the State of New York, New York County, against defendants Anselmo Marquez, McCollister's Transportation Group, Inc. and Advance Technology Transportation, LLC. Complaint, Exhibit A.

2. Defendants filed an Answer to the complaint. Exhibit B.

3. No other pleadings, process or orders were served in the state court action.

Citizenship Of The Parties

4. At the time the complaint was filed and now, plaintiff was and is a citizen of New York residing at 145 West 127<sup>th</sup> Street New York, NY 10027.

5. At the time the complaint was filed and now, defendant Marquez was and is a citizen of California residing at 34231 Shasta St, Murrieta, CA 92563.

6. At the time the complaint was filed and now, defendant McCollister's Transportation Group, Inc. was and is a Delaware corporation having its principal place of business at 8 Terri Lane, Burlington, New Jersey 08016, New Jersey.

7. At the time the complaint was filed and now, defendant Advance Technology Transportation, LLC was and is a New Jersey limited liability company, the sole member of which was and is defendant Marquez, having its principal place of business at 213 Lake Avenue Colonia, New Jersey 07067.

8. The citizenship of the defendants is completely diverse, nor is any defendant is a citizen of New York.

Removability

9. The action was not removable when the complaint was filed because the complaint, pursuant to New York CPLR 3017, does not state the amount of money to which plaintiff deems himself entitled as damages.

10. The action became removable on June 8, 2022, when plaintiff's counsel made a written settlement demand of \$250,000. Exhibit C.

11. Inasmuch as the citizenship of the parties is completely diverse, no defendant is a citizen of New York, the amount in controversy exceeds \$75,000 exclusive of interest and costs,

and this notice is filed within thirty days of plaintiff's written settlement demand, this action is removed to this court.

Dated: New York, New York  
June 15, 2022

LESTER SCHWAB KATZ & DWYER, LLP  
100 Wall Street  
New York, NY 10005  
212 964-6611  
Attorneys for Defendants

*s/Carmen Vasquez*

---

Carmen Vasquez